

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

KELLY PINN INDIVIDUALLY AND ON §  
BEHALF OF SIMILARLY SITUATED §  
PERSONS, §

PLAINTIFF §

VS. §

HUFSEY HOME SERVICES, INC. D/B/A §  
ONE HOUR AIR CONDITIONING & §  
HEATING AND 33 MILE RADIUS, LLC §  
D/B/A EVERCONNECT §

DEFENDANTS

CIVIL ACTION NO. 4:23-cv-01208-Y

**DEENDANT'S MOTION TO EXTEND TIME**

Defendant Hufsey Home Services, Inc. d/b/a One Hour Air Conditioning & Heating (Hufsey) files this motion to extend the time to answer or otherwise respond to the original complaint filed by Plaintiff Kelly Pinn individually and on behalf of similarly situated persons (Pinn) and in support thereof would respectfully show the Court the following:

On December 1, 2023, Pinn filed her original complaint. Doc. 1. On December 13, 2023, Pinn served Hufsey with a copy of the summons and complaint. Doc. 7. Per FED. R. CIV. P. 12, the deadline for Hufsey to answer Pinn's complaint was January 3, 2024.

Undersigned counsel was only recently retained. On January 31, 2023, the parties conferred regarding extending Hufsey's deadline to file its answer or otherwise respond. Pinn is unopposed to an extension until February 9, 2024 for Hufsey to file an answer only. However, given undersigned counsel has only recently familiarized themselves with the facts of this case and the pleadings, Hufsey requests additional time to determine if a responsive pleading other than an

answer is required. Accordingly, Hufsey requests that this Court extend the deadline to answer or otherwise respond to Pinn's complaint to February 9, 2024. In the alternative, Hufsey requests that this Court extend the deadline to answer to February 9, 2024.

For the reasons stated, Defendant Hufsey Home Services, Inc. d/b/a One Hour Air Conditioning & Heating requests that this Court grant the motion for extension of time to answer or otherwise respond to the original complaint filed by Plaintiff Kelly Pinn individually and on behalf of similarly situated persons to and including February 9, 2024.

In the alternative, Hufsey requests that this Court grant the motion for extension of time to answer the original complaint filed by Plaintiff Kelly Pinn individually and on behalf of similarly situated persons to and including February 9, 2024.

Respectfully submitted,

/s/ Joseph F. Cleveland, Jr.

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HUFSEY HOME SERVICES, INC. D/B/A

ONE HOUR AIR CONDITIONING &

HEATING

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been forwarded to counsel of record in this cause pursuant to and in accordance with the Federal Rules of Civil Procedure on February 1, 2024.

/s/ Angélique M. McCall

Angélique M. McCall

**CERTIFICATE OF CONFERENCE**

I hereby certify that on January 31, 2024, I conferred with Anthony Paronich, counsel of record for Plaintiff Kelly Pinn, individually and on behalf of similarly situated persons, to discuss the merits of this motion. Mr. Paronich is unopposed to the extension request for Defendant to file an answer only. Mr. Paronich is opposed to the request as it relates to any other responsive pleading. Therefore, it is presented to the Court for determination.

/s/ Angélique M. McCall

Angélique M. McCall

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